

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
KELLY ANJEL SALAT)	Case No. 20-31633-KRH
)	Chapter 13
Debtor)	

NOTICE OF MOTION TO IMPOSE THE AUTOMATIC STAY AND HEARING

The above-named Debtor, by counsel, has filed a Motion to Impose the Automatic Stay with the Court pursuant to 11 U.S.C. § 362(c)(4)(B). Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one.

NOTICE IS HEREBY GIVEN THAT A HEARING ON THIS MOTION WILL BE HELD ON April 8, 2020 at 12:00 p.m. in Honorable Kevin R. Huennekens' Courtroom, U.S. Bankruptcy Court, 701 E. Broad Street, Room 5000, Richmond, VA 23219.

If you want to be heard on this matter, then no later than three (3) days before the date of the hearing, you or your attorney must:

1. File with the court, at the address below, a written response pursuant to Local Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so that the Court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 E. Broad Street, Room 4000
Richmond, VA 23219-3515

2. You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, PC
P.O. Box 508
Richmond, VA 23218

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief.

James E. Kane (VSB# 30081)
Kane & Papa, P.C.
P. O. Box 508
Richmond, Virginia 23218-0508
Telephone (804) 225-9500
Counsel for Debtor

Respectfully submitted,

KELLY ANJEL SALAT
By Counsel

/s/ James E. Kane
James E. Kane (VSB# 30081)
Kane & Papa, P.C.
P. O. Box 508
Richmond, Virginia 23218-0508
Telephone (804) 225-9500
Counsel for Debtor

CERTIFICATE OF SERVICE

I certify that on March 25, 2020, I have transmitted a true copy of the foregoing document electronically through the Court's CM/ECF system or by mail to the Debtors, Chapter 13 trustee, the United States trustee if other than by the electronic means provided for at Local Bankruptcy Rule 2002-1, all attorneys appearing in the previous case as listed below, and to all creditors and parties in interest of the mailing matrix attached hereto.

/s/ James E. Kane
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:)	
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KELLY ANJEL SALAT)	Case No. 20-31633-KRH
)	Chapter 13
Debtor)	

MOTION TO IMPOSE AUTOMATIC STAY

COMES NOW KELLY ANJEL SALAT (the “Debtor”), by counsel, pursuant to 11 U.S.C. § 362(c)(4)(B) and files the following Motion to Impose Automatic Stay, and affirmatively states as follows:

1. Jurisdiction of this Court over the instant matter is based upon 28 U.S.C. §§ 1334 and 157 in that this action arises in and relates to the bankruptcy case of the Debtors.
2. This proceeding is a core proceeding under 28 U.S.C. § 157(b)(2)(A), (B), (K), and (O).
3. Venue is proper pursuant to 28 U.S.C. § 1409.
4. On March 20, 2020 (hereinafter the “Petition Date”), the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code (the “instant case”).
5. Within the year prior to filing the instant case, Debtor has been a debtor in two (2) pending Chapter 13 bankruptcy cases which were dismissed.

WHEREFORE, the Debtor, KELLY ANJEL SALAT respectfully requests this Honorable Court to enter an Order imposing the automatic stay as to all creditors, as to Debtor and the Debtor’s property, and as to the property of the estate for the duration of the instant case, and for such other and further relief as to the Court shall be deemed appropriate.

Respectfully submitted,

KELLY ANJEL SALAT

By Counsel:

/s/ James E. Kane

James E. Kane (VSB# 30081)

Kane & Papa, P.C.

P. O. Box 508

Richmond, Virginia 23218-0508

Telephone (804) 225-9500

Counsel for Debtor

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/s/ James E. Kane

Counsel for Debtor

Club Land'or Limited
2120 Staples Mill Road
Richmond, VA 23230

ECMC
P O Box 16478
Lock Box 8682
Saint Paul, MN 55116

FedLoan Servicing
Attn: Bankruptcy
Po Box 69184
Harrisburg, PA 17106

Global Payments
Po Box 66118
Chicago, IL 60666

I C System Inc
Attn: Bankruptcy
Po Box 64378
St Paul, MN 55164

Land'or International, Inc.
2120 Staples Mill Road
Suite 300
Richmond, VA 23230

Midland Funding
2365 Northside Dr Ste 300
San Diego, CA 92108

National Credit Adjusters LLC
Attn: Chassity Lindeman
PO Box 3023
Hutchinson, KS 67504

Select Portfolio Servicing
P.O. Box 65450
Salt Lake City, UT 84165

Virginia Department of Taxatio
PO Box 2369
Richmond, VA 23218

Wells Fargo Dealer
PO Box 25341
Santa Ana, CA 92799